

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 08 Civ. 10724 (SC)

DATE: September 29, 2011

MARIANA PREDA vs. NEW YORK PRESBYTERIAN HOSPITAL

EXHIBIT LIST

() PLAINTIFF

(X) DEFENDANT

EXHIBIT NUMBER	DATE		DESCRIPTION
	Marked for Identification	Admitted in Evidence	
D-501			NYPH Hospital Policies and Procedures Manual. Title Equal Employment Opportunity. Date Issued August 8, 2001. Policy No. 501. (D00805-806)
D-502			NYPH Personnel Policies and Procedures Manual. Title Equal Employment Opportunity. Date Issued October 2005. Policy No. 501. (D00807-808)
D-503			NYPH Human Resources Policy and Procedure Manual. Title Equal Employment Opportunity. Date Issued October 2007. Policy No. 501 (D00809-811).
D-504			NYPH Hospital Policies and Procedure Manual. Title Grievances. Date Issued January 1, 2002. Policy No. 408. (D00812-814).
D-505			NYPH Hospital Policies and Procedure Manual. Title Grievances. Date Issued September 2005. Policy No. 408 (D00815-817).
D-506			NYPH Hospital Policies and Procedure Manual. Title Grievances. Date Issued September 2007. Policy No. 408. (D00818-821).

EXHIBIT NUMBER	DATE		DESCRIPTION
	Marked for Identification	Admitted in Evidence	
D-507			NYPH Presbyterian Hospital. Hospital Policy and Procedure Manual. Date Issued January 1, 2002. Policy No. 412 (D00822-823).
D-508			NYPH Personnel Policy and Procedure Manual. Date Issued September 2005. Policy No. 412. (D00824-825)
D-509			NYPH Personnel Policy and Procedure Manual. Date Issued September 2007. Policy No. 412. (D00826-828)
D-510			Transfer Form dated June 16, 2004 (P0046-47)
D-511			Transfer Form dated July 16, 2003 (D00136-00137; Preda 7)
D-512			Candidate Information Sheet for Mariana Preda added July 17, 2003 (D00127-D00128; Preda 8)
D-513			Job Requisition History added July 17, 2003 (D00133-D00135; Preda 8)
D-514			Job Description Medical Surgical Technician (D00602-D00603)
D-515			Departmental Personnel Record re: August 10, 2003 Transfer (D593)
D-516			2003 Mandatory Education Self-Learning Module dated November 10, 2003 (D00560)
D-517			Transfer Form dated February 11, 2004 (D289)
D-518			March 30, 2004 Letter to To Whom It May Concern from Jeffrey M. Milsom, MD (P0022; Plaintiff's 1)

EXHIBIT NUMBER	DATE		DESCRIPTION
	Marked for Identification	Admitted in Evidence	
D-519			April 2004 Orientation Period of Employment Evaluation (P0033-34)
D-520			April 5, 2004 Employee Evaluation (P0035- 41)
D-521			April 21, 2004 Grievance by Mariana Preda (D00790-792)
D-522			Intentionally Omitted
D-523			Letter to Gayle Kolt from nurse practitioner (Dee Ann Davidson) dated April 27, 2004 (D569-570)
D-524			Letter from Sang W. Lee MD to Kolt dated April 27, 2004 (D571)
D-525			April 28, 2004 Letter to Gayle Kolt from Jeffrey M. Milsom, MD (D00572; Plaintiff's 2)
D-526			Human Resources Counseling Memo dated May 19, 2004 (D108-109)
D-527			June 2, 2004 Human Resources Counseling Memo Re: Unfair Evaluation (D00002- D00003)
D-528			June 1, 2004 Review (D00004-00011)
D-529			June 10, 2004 Letter to Mariana Preda from Gayle B. Kolt (D00793; Kolt 2)
D-530			Human Resources Counseling Memo dated September 2, 2004 (D110-111)
D-531			September 3, 2004 to Gayle Holt from Joyce Kaminsky (D00573)
D-532			September 6, 2004 Fax from Virna (D00574)
D-533			September 8, 2004 Fax Documentation from Dr. Jeffrey Milsom (D00575);
D-534			Corrective Action Report dated September 21, 2004 (D00101)
D-535			Corrective Action Report dated September

EXHIBIT NUMBER	DATE		DESCRIPTION
	Marked for Identification	Admitted in Evidence	
			21, 2004 (P0032)
D-536			October 23, 2004 Human Resources Counseling Memo (D00113-00114)
D-537			Acknowledgement 2004 Mandatory Education Self-Learning Module dated October 30, 2004 (D00566)
D-538			November 3, 2004 Letter Dear Sirs from Mariana Preda (P0058-59; Kolt 1)
D-539			November 8, 2004 Human Resources Counseling Memo re: Diane Gee (D00117- D00118)
D-540			Letter to Preda from Maurice Lee dated November 11, 2004 (P61)
D-541			Letter to Preda from Pagliaro dated November 11, 2004 (P60)
D-542			December 8, 2004 Incident Date (D00576) [Redacted to remove Patient Identifying Information]
D-543			December 13, 2004 Fax of Handwritten Note re failure to offer patient assistance (D00112)
D-544			December 13, 2004 Human Resources Counseling Memo (D00115-116)
D-545			January 4, 2005 NYPH Work Improvement Plan (D00577; Kolt 5)
D-546			January 4, 2005 Corrective Action Report (D00581; Kolt 4)
D-547			January 13, 2005 Memo re: Mariana Preda from Nevette Shlasko and Jeffrey Milsum (D00578)
D-548			January 19, 2005 Note to File from G. Kolt and N. Cunningham (D00580)
D-549			January 24, 2005 Receipt of Employee Handbook (00121)
D-550			May 18, 2005 Letter to Preda From Brian Hale (D00001)

EXHIBIT NUMBER	DATE		DESCRIPTION
	Marked for Identification	Admitted in Evidence	
D-551			May 18, 2005 Letter to Preda From Brian Hale (P0086)
D-552			May 19, 2005 Employee Action Form (D01021)
D-553			Social Security Administration Retirement, Survivors, and Disability Insurance Notice of Award dated June 27, 2009 (P17-21) (for Court)
D-554			Explanation of Determination (SSA003) (For Court)
D-555			Disability Determination and Transmittal (SSA004) (for Court)
D-556			Disability Report Adult SSA Form 3368 (SSA0032-39) (for Court)

Defendant reserves the right to: (1) offer all or any portion of any exhibit listed above, including substituting an exhibit for a cleaner copy if one exists; (2) offer and use any of the exhibits listed herein for more than one purpose; (3) not to offer any of the exhibits listed herein; (4) offer any exhibit designated on Plaintiff's exhibit list, whether or not offered by the Plaintiff; (5) offer additional exhibits at trial, including excerpts from deposition transcripts, for purposes of cross-examination, impeachment or rehabilitation; and (6) offer additional exhibits on rebuttal. Defendant also reserves the right to amend its exhibits and responses following the Court's in limine and evidentiary rulings.

Dated: New York, New York
September 29, 2011

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

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